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*Attorneys for Defendants*  
*CERTAIN UNDERWRITERS AT LLOYD’S,*  
*LONDON, AS SUBSCRIBED TO POLICY*  
*NUMBER MPL4147217.19 and HISCOX, INC.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

AMERICAN PROTECTION GROUP, INC.

Case No.: 2:22-CV-00492-RFB-BNW

Plaintiff,

vs.

**STIPULATION AND ORDER TO  
DISMISS WITHOUT PREJUDICE**

CERTAIN UNDERWRITERS AT LLOYD’S,  
LONDON AS SUBSCRIBED TO POLICY  
NUMBER MPL4147217.19; SYNDICATE NO.  
3624; HISCOX, INC. dba HISCOX INSURANCE  
AGENCY; DOE INDIVIDUALS I through X,  
inclusive; and ROE CORPORATIONS I through X,  
inclusive,

Defendants.

Plaintiff, AMERICAN PROTECTION GROUP, INC., (“APG”), by and through its attorney, Joshua P. Barrett, Esq. of the law firm of BIGHORN LAW, and Defendants CERTAIN UNDERWRITERS AT LLOYD’S, LONDON AS SUBSCRIBED TO POLICY NUMBER MPL4147217.19, SYNDICATE NO. 3624 and HISCOX, INC. dba HISCOX INSURANCE AGENCY (“Defendants”), by and through their attorney, Brian K. Walters, Esq. of the law firm GORDON REES SCULLY MANSUKHANI, LLP, hereby stipulate and agree to the dismissal without prejudice of Plaintiff’s Complaint (ECF No. 1, pg. 7) on file herein and all of Plaintiff’s claims asserted against Defendants, subject to a full reservation of the parties’ respective rights, with each party to bear its own attorneys’ fees and costs.

Gordon Rees Scully Mansukhani, LLP  
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Las Vegas, NV 89101

**IT IS SO STIPULATED.**

DATED this 20<sup>th</sup> day of December, 2022.

GORDON REES SCULLY  
MANSUKHANI, LLP

/s/ Brian K. Walters  
Brian K. Walters, Esq.  
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*Attorneys for Defendants  
CERTAIN UNDERWRITERS AT LLOYD'S,  
LONDON, AS SUBSCRIBED TO POLICY  
NUMBER MPL4147217.19 and HISCOX, INC.*


DATED this 20<sup>th</sup> day of December, 2022.

BIGHORN LAW

/s/ Joshua P. Barrett  
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*Attorneys for Plaintiff AMERICAN  
PROTECTION GROUP, INC.*

**IT IS SO ORDERED**

  
**RICHARD E. BOULWARE, II**  
**United States District Court**

DATED this 27<sup>th</sup> day of December, 2022.

Respectfully Submitted:

GORDON REES SCULLY  
MANSUKHANI, LLP

/s/ Brian K. Walters  
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